

Applicants incorporate herein by reference all prior arguments of record setting forth deficiencies of the cited reference. As apparently recognized by the Patent Office, the cited reference does **not** teach or suggest the present invention.

Nevertheless, the Patent Office has now asserted that the cited reference hypothetically **“raises the question** of whether any earlier documents were published prior to the date of the article” and that “Applicant **fails to disclose** any information regarding the system that may be material to the patentability of the disclosed invention.” However, it is most respectfully submitted that **no** prior art has been cited that supports the Patent Office’s **suppositions**.

It is respectfully submitted that **no evidence has been located** of any prior publication or use that would qualify as prior art under 35 U.S.C. 102(a). While Applicants will make a continued effort during the pendency of this application to bring to the Examiner’s attention prior art that may be material to the examination of this case—whether prior art of Citibank, with its vast number of departments and employees, or of another entity—it is most respectfully submitted that there is no basis to maintain the present rejections.

It is respectfully submitted that the purported teaching in the cited newswire is sparse and unclear and does not support the existence of any prior art that is not the Applicants’ own technology. Applicants’ own technology would clearly not be prior art as the newswire was released on October 6, 1994, substantially less than one year prior to the priority date of June 7, 1995. Notably, the newswire does not suggest a prior use or publication more than one year earlier, but merely states that “Citibank said Wednesday that its brokerage customers can **now** use its automated teller machines to ....”

It is also respectfully noted that the cited newswire describes technology purportedly owned by the same assignee of the present invention—i.e. , Citibank. See 35 U.S.C. 103(c).

Withdrawal of these rejections is, thus, most respectfully requested.

**CONCLUSION**

Early reconsideration and allowance are most respectfully requested. If the Examiner desires to discuss any aspect of this case, the Examiner is encouraged to contact the undersigned representative via telephone at the below-identified telephone number.

Respectfully submitted,

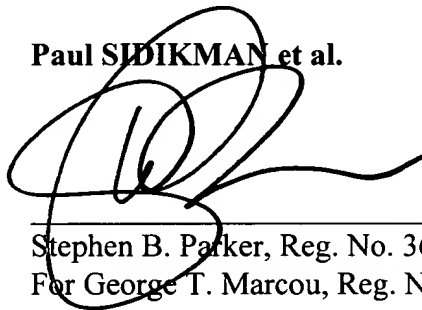
**Paul SIDIKMAN et al.**

Date: \_\_\_\_\_

*2/28/01*

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